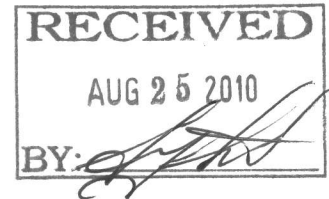


HENNIGES
AUTOMOTIVE
IOWA INC.
3200 MAIN STREET
KEOKUK, IOWA 52632



August 20, 2010

AWMD / WEMM

AUG 27 2010

RECEIVED

Mr. Gary Witkovsky
U.S. EPA Region 7
Federal Building
210 Walnut Street, Room 473
Des Moines, IA 50309-2109

Dear Sir:

I am writing in response to the revised NOV received on 8/19/2010 from Mr. David Homer in regards to a RCRA audit that he performed at my facility on 7/20/2010.

Items 3 and 4 on the revised list were corrected and addressed in the original response item 2. I would only like to add that we do inspect the Hazardous Waste Storage area on a weekly basis. We didn't consider the Satellite Accumulation area in question as a storage area, so were not inspecting it on a weekly basis. As I stated in my response of 7/29/201, I have taken steps to correct our Satellite Accumulation area issues by conducting RCRA training, which was completed on 8/6; and by adding the Satellite Accumulation areas to the weekly waste inspection checklist.

Item number 5, not using "Used Oil" labels, will be corrected by 8/23/2010. We used the "Oil Sludge" labels as a way to keep the materials that we pump to our "Used Oil" storage tank separated from those materials that we could not pump to our "Used Oil" storage tank. It was an oversight on our part.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe Lehrter".

Joe Lehrter
Senior EHS Specialist
Henniges Automotive Iowa Inc.
3200 Main Street
Keokuk, IA 52632



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